

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ENRIQUE COURTNEY HUBER,	§	
PLAINTIFF,	§	
	§	CASE NO. 4:20-cv-03997
V.	§	JURY DEMANDED
	§	
GALVESTON COUNTY, ET AL.	§	
DEFENDANTS.	§	
	§	

**PARTIALLY UNOPPOSED MOTION TO EXTEND EXPERT DESIGNATION
DEADLINES**

TO THE HONORABLE JUDGE JEFFREY V BROWN

Plaintiff, Courtney Hubner, in the above-referenced matter. Pursuant to this court's Procedures files this his opposed Motion to Extend Plaintiff's Expert Report due on October 1, 2021, for parties seeking affirmative relief, Plaintiff.

The Parties Current Docket Control Order was issued when the case was in the Southern District of Houston by Judge Hoyt. It set the Expert Deadlines and all parties asserting claims for relief shall file and serve on all other parties their designation of potential witnesses, testifying experts, and proposed exhibits, and shall serve on all other parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B) on or before October 1, 2021. There has not been a scheduling order issued since the court dang jurisdiction over the case in the Galveston division.

Plaintiff's counsel conferred via email with each defendant's counsel. Defendant Galveston County is unopposed, but the other Defendants have not indicated whether they were opposed or unopposed to this Motion for extension of time to file expert designations for all parties for 45 days. Therefore, Courtney Hubner submits this motion as unopposed, subject to amendment.

Just cause exists for the filing of this motion. The parties have not been able to

complete the key depositions, pending the rulings on the motions to dismiss that are currently pending and there's not an adequate amount of time to allow the experts to review the depositions, and complete their reports.

PRAYER

For the aforementioned reasons, Plaintiff respectfully requests that this Court grant the Motion for the Extension for all parties to Designate Expert Witnesses Deadline for Plaintiff for 45 days from the ruling of the Motion to Dismiss.

By:/s/ U.A. Lewis
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CERTIFICATE OF SERVICE

I certify that on October 1, 2021, I served a true and correct copy of the proceeding was served to all parties or counsel of record.

/s/ U.A. Lewis
U.A. LEWIS